



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 05 2015

CERTIFIED MAIL 7009 1680 0000 7648 7337
RETURN RECEIPT REQUESTED

Mr. James Kucia
President
Midwest Galvanizing, Inc.
7247 S. 78th Avenue
Bridgeview, Illinois 60453

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 980 997 308

Dear Mr. Kucia:

On September 3, 2014 a representative of the U.S. Environmental Protection Agency inspected the Midwest Galvanizing, Inc. facility (MW Galvanizing) located in Bridgeview, Illinois. As a large quantity generator of hazardous waste, MW Galvanizing is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate MW Galvanizing's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by MW Galvanizing, EPA's review of records pertaining to MW Galvanizing, and the inspector's observations, EPA has determined that MW Galvanizing has unlawfully stored hazardous waste without a permit or interim status as a result of MW Galvanizing's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which MW Galvanizing was out of compliance at the time of the inspection in paragraphs 1-4, below.

At the time of the inspection, MW Galvanizing was out of compliance with the following large quantity generator permit exemption conditions:

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

1. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(c)(1)(B) [40 C.F.R. § 262.34(c)(1)(ii)], a large quantity generator who accumulates as much as 55 gallons of hazardous waste in containers at or near the point of generation (satellite accumulation) must mark each container with the words "Hazardous Waste" or with other words that identify the contents of the containers.

At the time of the inspection, MW Galvanizing was accumulating three satellite accumulation containers of hazardous waste without the words "Hazardous Waste" and without other words that identify the contents.

2. Hazardous Waste Tank Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each tank holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, MW Galvanizing was accumulating hazardous waste in a hazardous waste storage tank without it being marked with the words "Hazardous Waste."

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 3-4 are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of MW Galvanizing to comply with these conditions are also violations of the corresponding requirements in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265].

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

3. Use and Management of Containers

A large quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.273(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)]. A large quantity generator must inspect hazardous waste containers and areas where containers are stored, at least weekly, looking for

leaks and for deterioration caused by corrosion or other factors. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.274 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.174].

At the time of the inspection, MW Galvanizing had five containers of hazardous waste that were open while no one was adding or removing waste.

At the time of the inspection, MW Galvanizing had not been conducting weekly inspections of containers for the less than 90-day hazardous waste storage area.

4. Contingency Plan

A large quantity generator of hazardous waste must have a contingency plan that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.151(a) [40 C.F.R. §§ 262.34(a)(4) and 265.51(a)]. A large quantity generator must list names, addresses and phone numbers of all persons qualified to act as emergency coordinator. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152(d) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)]. A large quantity generator must include an updated list of all emergency equipment at the facility, including the location, physical description and capabilities of each item. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152(e) [40 C.F.R. §§ 262.34(a)(4) and 265.52(e)]. A large quantity generator must include an evacuation plan with evacuation routes. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152(f) [40 C.F.R. §§ 262.34(a)(4) and 265.52(f)]

At the time of the inspection, MW Galvanizing did not have a contingency plan with the name, address and phone number of the alternate emergency coordinator.

At the time of the inspection, MW Galvanizing did not have a contingency plan with an updated list of all their emergency equipment that included the location, physical description and capabilities of each item.

At the time of the inspection, MW Galvanizing did not have a contingency plan that included evacuation routes.

By failing to comply with the conditions for a permit exemption, above, MW Galvanizing became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. MW Galvanizing failed to apply for such a permit. MW Galvanizing's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40

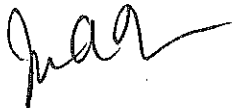
C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring MW Galvanizing to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-4, above.

During the inspection, as observed by EPA, and after the inspection, as documented in a November 3, 2014 email to EPA, you took certain actions to establish compliance with the above permit conditions listed in paragraphs 1 and 3, above. Your email did not include any actions you may have taken, or those actions did not satisfy the regulatory requirements, related to the permit conditions listed in paragraphs 2 and 4, above. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1-4. You should submit your response to Graciela Scambiaterra, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604."

If you have any questions regarding this letter, please contact Ms. Graciela Scambiaterra, of my staff, at 312-353-5103 or at scambiaterra.graciela@epa.gov.

Sincerely,



For | Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
LAND AND CHEMICALS DIVISION, RCRA BRANCH
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Midwest Galvanizing, Inc.

EPA ID No.: ILD 980 997 308


LOCATION ADDRESS: 7247 S. 78th Avenue
Bridgeview, Illinois 60453

NAICS CODE(s): 332812 [Metal Coating, Engraving (Except Jewelry and
Silverware) and Allied Services to Manufacturers]

DATE OF INSPECTION: September 3, 2014

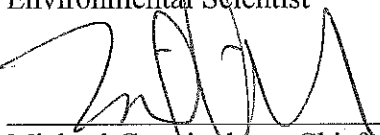
U.S. EPA INSPECTOR(s): Graciela Scambiaterra

PREPARED BY:


Graciela Scambiaterra
Environmental Scientist

7/8/2015
Date

APPROVED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

1/28/15
Date

RCRA Compliance Evaluation Inspection

Introduction

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Midwest Galvanizing, Inc. (MW Galvanizing), located at 7400 S. Damen Avenue, Chicago, Illinois. I was joined by Calvin Harris of the Illinois Environmental Protection Agency (Illinois EPA). The Purpose of the CEI was to evaluate MW Galvanizing's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

Photographs (photos) taken during the inspection are attached (Attachment 1). Documents obtained during the inspection are annotated in Attachment 3.

History and Interview

I arrived at MW Galvanizing on September 3, 2014 at approximately 9:45 a.m., however there was heavy construction in the area and the entrance to the MW Galvanizing was blocked off of Damen Avenue so I had to circle around to 74th Street in order to access the parking lot. I met Mr. Harris in the parking lot and we both entered the facility together. I identified myself and approached an employee and asked to speak with the owner or an environmental contact for the facility. Mr. Harris and I were escorted to the office area and introduced to Mr. James Kucia, President of MW Galvanizing. I provided him my credentials, held an opening conference and provided Mr. J. Kucia the Small Business Resources Guide. The following individuals were present during the CEI:

NAME	TITLE	EMPLOYER
Gracie Scambiaterra	Environmental Scientist	U.S. EPA
James Kucia	President	MW Galvanizing
Alex Kucia	Quality Manager	MW Galvanizing
Calvin Harris		Illinois EPA

During the opening conference, I explained to Mr. J. Kucia what specific records I would need to review. Shortly after I began the opening conference, Mr. Alex Kucia, Quality Manager for MW Galvanizing joined us for the remaining part of the CEI. I informed both MW Galvanizing representatives that either should notify me immediately if any information and/or documents they provide me were of Confidential Business Information (CBI). I explained to them that any CBI would be handled in accordance with EPA policy.

MW Galvanizing originally notified EPA of its hazardous waste activities as a large quantity generator (LQG) on or about 1/8/1985 and had an NAICS code of 332812

[Metal Coating, Engraving (Except Jewelry and Silverware) and Allied Services to Manufacturers]. MW Galvanizing employs approximately 18 employees at this location and operates Monday through Friday, for approximately 10 hours per day.

MW Galvanizing is currently an LQG.

According to Mr. J. Kucia, MW Galvanizing's process is considered to be hot dip galvanizing of iron or steel, which is performed in order to protect the metal from corrosion. They receive completed products already made by other facilities and then run them through the galvanizing process. The process involves immersing clean, oxide-free iron or steel into molten zinc in order to form a zinc coating that is metallurgically bonded to the metal's surface. The zinc coating protects the surface against corrosion by providing protection to the metal by shielding the base metal from the atmosphere and by giving the metal cathodic protection.

The four fundamental steps of galvanizing are surface preparation, prefluxing, galvanizing and finishing. The surface preparation consists of cleaning operations that free the surface of dirt, grease, rust and scale. MW Galvanizing uses Hydrochloric Acid (HCL) for this step. The preflux step dissolves any oxide that may have formed on the iron or steel surface after cleaning and prevents further rust from forming. The clean, oxide-free metal is galvanized by immersion into the molten zinc. The final finish operation includes quenching the metal in water to remove any excess zinc.

Mr. J. Kucia briefly explained the type of hazardous wastes that MW Galvanizing generates. Hazardous waste, carrying the waste codes D002, D006 and D008, is generated once these galvanizing process baths are emptied at the time when the transporter pumps the material onto a truck for shipment off-site. Mr. J. Kucia provided a document on zinc shipments and amounts shipped (*see* annotation of Document #1 [Attachment 3]). In addition, I was provided with a copy of the facility site plan (*see* annotation of Document #2 [Attachment 3]).

After our opening discussion, approximately 10:55 a.m., I began the site inspection.

Site Inspection

The MW Galvanizing site inspection began at 10:55 a.m. at the west end wall of the facility. Mr. J. Kucia escorted me during the site inspection.

We started in this area because it was the beginning of the process. Metal pieces are staged in this area that will undergo galvanizing. I noticed many metal pieces in the area. While we walked around the facility, I noticed a very strong, pungent smell that made my nose and throat itch and burn, and caused me to cough. I asked Mr. Kucia about the smell and he informed me it was likely the HCL from the process tanks/baths.

We continued our walk through the facility and ended up at the main part of the facility's process, the Center Area/Process Baths. The pungent smell was stronger in this area. I

asked Mr. Kucia if the smell bothered him and he replied in the negative. The Center Area had six process tanks, or baths (metal pieces undergo preparation here before they get zinc galvanized). The table below depicts the process tanks and their volumes (*see* annotation of Document #3 [Attachment 3]):

Tank/Process Bath #	Contents	Volume
6 (Far West side)	HCL	10,080 gallons
5	HCL	6,732 gallons
4	HCL	9,424 gallons
3	Rinse water	6,732 gallons
2	Rinse water	6,732 gallons
1 (Far East side)	Preflux (zinc ammonium)	6,732 gallons

Process tanks number 2-5 are in between tanks #s 1 and 6. Located directly under the process tanks/baths was a containment pit and a sump pit. The containment pit/sump pit is considered a hazardous waste storage tank. I did not notice a hazardous waste label on or near the containment pit/sump pit. I pointed this out to Mr. Kucia. Upon further inspection of the pit area, I noticed and photographed liquid waste in the pit (*see* photos 1-5). Photos 1-2 was of the pit area directly under the HCL and rinse water tanks. Photos 3-4 are of the sump area where the liquid drains into. Photo 5 is of the liquid in the sump tank – approximately one foot of liquid was measured.

Once the metal pieces undergo the preparation process above, they will get galvanized in a molten zinc bath (approximately 850 degrees F). This galvanizing zinc bath is located east of the process tanks/baths. Two additional water tanks are located after the zinc galvanizing tank that are used for cooling the metal pieces after they've undergone the molten zinc process.

Located next to the HCL tanks was the Drum Storage Area. Waste sludge from the HCL tank cleanouts and skimming waste from the top of the HCL tanks are placed in 55-gallon containers and are stored here (*see* photos 6-7). One waste container was not covered, and the second contained liquid hazardous waste with a loose lid without a locking lever.

We continued the walk around the remaining parts of the facility, including the south side of the facility where the material storage areas were located. Here, zinc blocks are stored until they are sold or recycled offsite.

The MW Galvanizing morning site inspection ended at approximately 11:25am, at which time we returned to the office area so I could conduct the records review. Mr. A. Kucia joined us for the records review.

Records Review

Training

I asked Mr. J. Kucia for 2013, 2012 and 2011 training records. He provided me the following:

James Kucia:

- Environmental Compliance Seminar - Hazardous Waste, by Professional Presentations.
- Certificates of training: 8/1/14, 8/8/13, 8/1/12 and 8/11/11.

Alex Kucia:

- Environmental Compliance Seminar - Hazardous Waste, by Professional Presentations.
- Certificates of training: 2/27/14, 3/21/13, 3/28/12 and 3/3/11.

In-house hazardous waste training:

- Trainer: Alex Kucia
- 1/30/14: 20 employees in attendance.
- 2013 (no specific date noted in training sheet): 12 employees in attendance.
- 4/12/12: 18 employees in attendance.
- 3/19/11: 18 employees in attendance.

Contingency Plan

Mr. J. Kucia provided the Contingency Plan for my review. The plan was titled "Contingency Plan and Waste Management Training for MW Galvanizing."

The plan I reviewed listed James Kucia as the Emergency Coordinator. Mr. J. Kucia informed me that he had designated Alex Kucia as the alternate Emergency Coordinator, however, Mr. A. Kucia's name and information was not listed in the plan.

Emergency response procedure for spills, fires, explosions and gas releases were included in the plan. Additionally, the plan contained arrangements made with the Chicago police, fire, local hospital and emergency response.

What was not included in MW Galvanizing's contingency plan was an evacuation plan with evacuation routes or a list of emergency response equipment capacities and their location.

Tank System

I reviewed the tank assessment Mr. J. Kucia provided me. It was titled "Concrete and Brick Containment Pit," performed by Effluent Technology, Inc. on February 3, 2006. Mr. J. Kucia showed me the high level alarm visible in the office area. I then re-iterated to Mr. J. Kucia that the sump pit/tank system did not have a hazardous waste label.

Hazardous Waste Determinations

Mr. J. Kucia provided me the hazardous waste determinations for the following waste streams:

1. HCL rinsewater
2. Spent acid sludge.

Manifests/LDRs

I reviewed the manifests and land disposal restriction (LDR) forms for years 2012 until the present time. Below are the most recent hazardous waste shipments:

Hazardous Waste Manifests				
Manifest Number	Waste Code(s)	Quantity	Date	TSDf Signature
004623991 FLE	D002/D008	4000 gal	6/9/14	Yes
004623990 FLE	D002/D008	4400 gal	6/9/14	Yes
011207056 JJK	D002/D008/D006	330 gal	3/10/14	Yes
004623996 FLE	D002/D008	4300 gal	1/15/14	Yes

I asked Mr. J. Kucia about the frequency of the tank cleanouts. He informed me that approximately every 4-6 months tanks are cleaned and replenished with new tank material. However, that schedule did fluctuate slightly as the summer months are busier and winter is slower for business.

I asked Mr. A. Kucia to expound on the "skimming of waste from the top of the tanks" that had been explained to me during the site inspection. He explained that skimming occurs throughout the year to try and extend the use of the HCL for as long as possible. He informed me that they use buckets to accumulate "skimming waste" from the top of the HCL tanks first near the lines and then the skimming waste is placed in 55-gallon drums. Since I had not photographed these buckets during the site inspection, I asked for Mr. J. Kucia to show me the waste containers.

Site Inspection (continued)

We went back out to the center process line at approximately 12:10 p.m.

I noted three 5-gallon buckets with HCL skimming waste (*see* photos 8-11). Photos 8-9 were of the same 5-gallon bucket. None of the three containers were closed or labeled with the contents.

We returned to the office where I continued the records review.

Records Review (continued)

Inspections:

I reviewed the daily inspection records for the sump tank/tank system. I asked Mr. J. Kucia about the weekly inspection records for the less than 90-day storage area and he informed me they were not accomplishing them.

Annual Reports

Hazardous Waste Annual Report									
Calendar Year:			2013		Date Signed:		2/27/2014		
Certified Mail Receipt: Unknown									
Waste Streams Reported									
D002	D006	D008							
Transporters and Treatment, Storage, and Disposal Facilities Used:									
OHD020273819									
ILD000666206									

Hazardous Waste Annual Report									
Calendar Year:			2012		Date Signed:		2/28/2013		
Certified Mail Receipt: Unknown									
Waste Streams Reported									
D002	D006	D008							
Treatment, Storage, and Disposal Facilities Used:									
OHD020273819									
ILD000666206									

Hazardous Waste Annual Report									
Calendar Year:			2011		Date Signed:				
Certified Mail Receipt: Unknown									
Waste Streams Reported									
D002	D006	D008							
Transporters and Treatment, Storage, and Disposal Facilities Used:									
OHD020273819									

ILD000666206	
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I concluded the records review at 12:45pm and asked to see the containment pit/sump pit area one more time.

Site Inspection (continued)

While I was there, I took two additional photos of the sump pit tank area (*see* photos 12-13).

We then walked back to the office area and I prepared for the closing conference.

Closing Conference

I held a closing conference with Mr. J. Kucia, Mr. A. Kucia, and Calvin Harris in attendance. The following topics were discussed:

1. Contingency Plan:
 - The alternate Emergency Coordinator needs to be listed in the plan.
 - Emergency equipment list needs capacities and locations listed in the plan.
 - Evacuation routes were not in the plan.
2. Weekly inspections of the less than 90-day storage area are required.
3. Hazardous waste storage tank/sump pit not labeled with the words "Hazardous Waste."
4. Container issues:
 - All five (5) containers were open.
 - Three (3) containers not labeled.

I completed the CEI and departed the facility at approximately 1:15pm.

ATTACHMENTS: (3)

Attachment 1	Photograph taken during the inspection
Attachment 2	Inspection checklist
Attachment 3	List of documents obtained during the CEI



Photo 1: Photographer: G. Scambiaterra. Time: 11:03am
Description: Sump pit area (directly under HCL tanks)



Photo 2: Photographer: G. Scambiaterra. Time: 11:03am
Description: Sump pit area (directly under HCL tanks)



Photo 3: Photographer: G. Scambiaterra. Time: 11:05am
Description: Sump pit area (drains here)



Photo 4: Photographer: G. Scambiaterra. Time: 11:05am
Description: sump pit (drains here)



Photo 5: Photographer: G. Scambiaterra. Time: 11:05am
Description: 1 foot of liquid waste in sump pit.



Photo 6: Photographer: G. Scambiaterra. Time: 11:10am
Description: open container of hazardous waste sludge.



Photo 7: Photographer: G. Scambiaterra. Time: 11:10am
Description: container of hazardous waste sludge, lid on loosely.

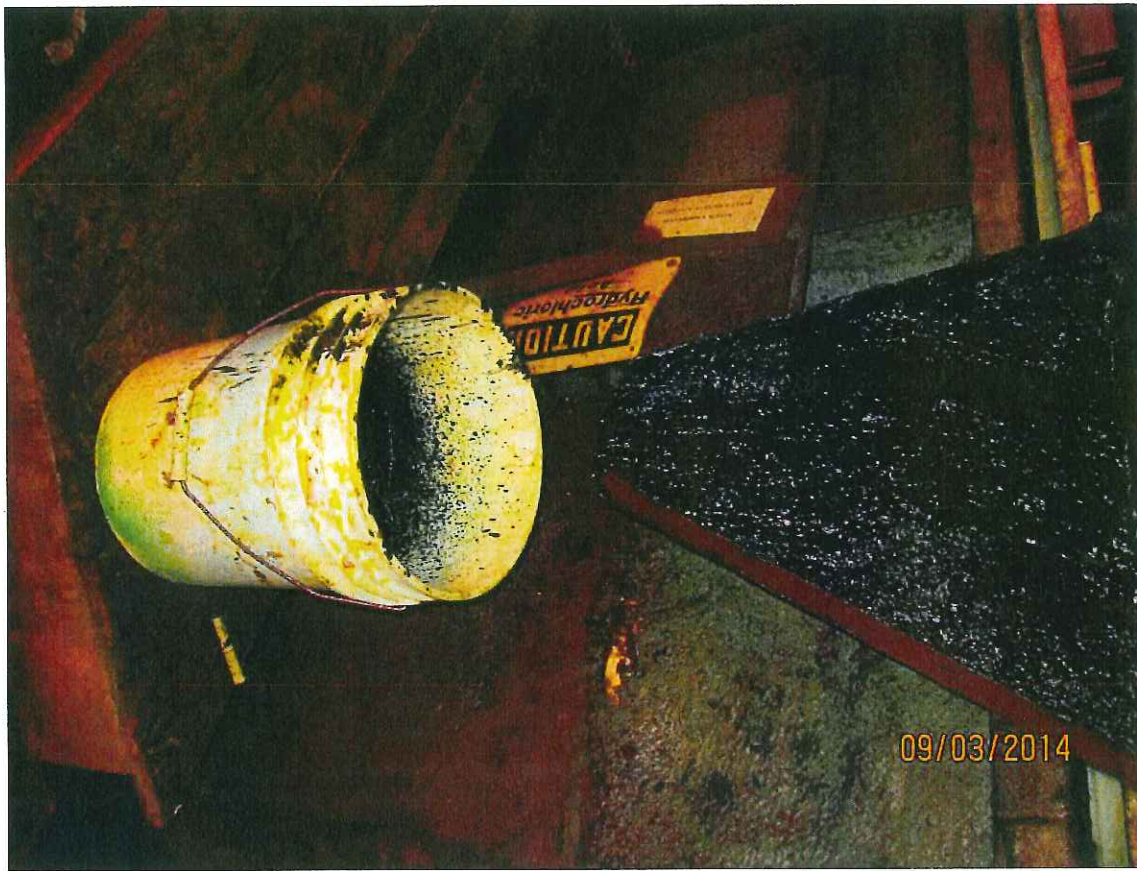


Photo 8: Photographer: G. Scambiaterra. Time: 12:13pm
Description: Satellite container of hazardous waste "skimmings"

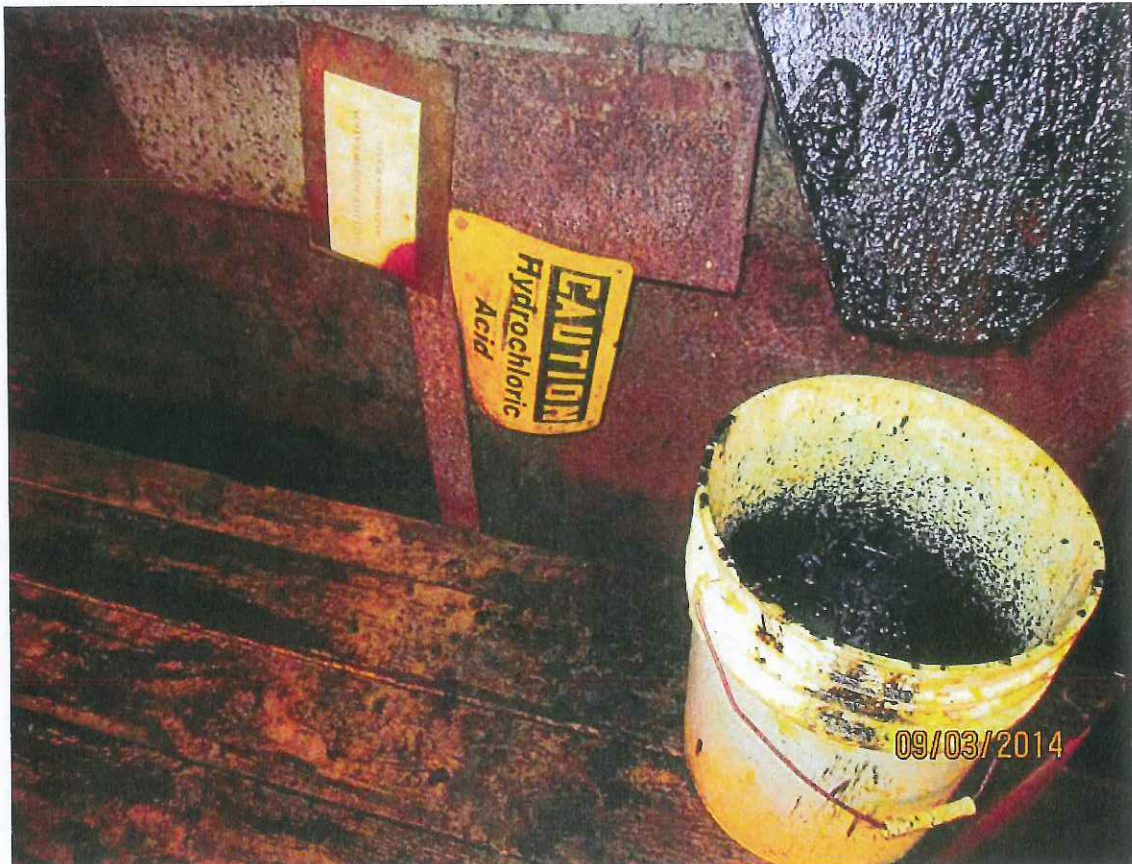


Photo 9: Photographer: G. Scambiaterra. Time: 12:13pm
Description: Satellite container of hazardous waste "skimmings"



Photo 10: Photographer: G. Scambiaterra. Time: 12:13pm
Description: Satellite container of hazardous waste "skimmings"



Photo 11: Photographer: G. Scambiaterra. Time: 12:13pm
Description: Satellite container of hazardous waste "skimmings"



Photo 12: Photographer: G. Scambiatterra. Time: 12:46pm
Description: Sump pit tank.



Photo 13: Photographer: G. Scambiaterra. Time: 12:46pm
Description: Sump pit tank

Installation Name:
Midwest Galvanizing, Inc.
Date of Inspection:
September 3, 2014

Location Address:
7247 S. 78th Avenue
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 980 997 308

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(b)
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)

Installation Name:
Midwest Galvanizing, Inc.
Date of Inspection:
September 3, 2014

Location Address:
7247 S. 78th Avenue
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 980 997 308

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>has the generator followed the procedures prescribed in Section 722.123 for manifesting bulky shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.123(c)
722.130	<p>SUBPART C: PRE-TRANSPORT REQUIREMENTS</p> <p>Is there any hazardous waste ready for transport off-site? <input checked="" type="checkbox"/></p> <p>Yes _____ No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	722.130
(722.134(a))	<p>Section 722.134 Accumulation Time</p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No _____ N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers? <input checked="" type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
(725.211) (725.214)	<p>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.211 725.214

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(725.271)	<p>If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.272)	<p>Is the waste compatible with the container and/or liner?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.273(a))	<p>Are containers of hazardous waste always closed except to remove or add waste during accumulation?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(725.273(b))	<p>Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)</p> <p>Yes _____ No _____ N/A _____</p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p>	
	<p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.211)		725.211
(725.214)		725.214

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(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) hazardous characteristics of the wastes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) existing corrosion protection measures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) documented age of the tank system? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

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(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) hazardous characteristics of the waste(s) to be handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

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(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Are welded flanges, joints and connections inspected daily? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

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(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 2) overfill prevention controls? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 3) sufficient freeboard in uncovered tanks? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.294(c))	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 2) the aboveground portion of the tank system for corrosion or releases? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 3) data from monitoring equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____ b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____ Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

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(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	

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(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ COMMENTS:	
(725.302)	Section 725.302 Air Emission Standards Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Comments:	
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes _____ No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes _____ No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes _____ No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes _____ No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

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(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes _____ No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes _____ No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes _____ No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes _____ No _____ N/A _____ 	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	<p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes _____ No _____ N/A _____</p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes _____ No _____ N/A _____</p> <p>If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A _____</p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> - fires? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - explosions? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - releases? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - hospitals? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - contractors? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - emergency response teams? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - capability? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - location? Yes _____ No <input checked="" type="checkbox"/> N/A _____ <p>Is the list of emergency equipment up-to-date? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes _____ No _____ N/A _____ - an evacuation signal? Yes _____ No _____ N/A _____ - alternate evacuation routes? Yes _____ No _____ N/A _____ 	No evacuation routes

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.153)	<p>Has the contingency plan (including all revisions) been: <input checked="" type="checkbox"/></p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <p>- police department? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- fire department? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospital? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Installation Name:
Midwest Galvanizing, Inc.
Date of Inspection:
September 3, 2014

Location Address:
7247 S. 78th Avenue
U.S. EPA Inspector:
Graciela Scambiaterra

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170

Document List

Documents received during the inspection:

Document #	Description	Claimed as CBI
1	Copy of zinc shipments	No
2	Facility Site Plan	No
3	Tank volumes	No